

Mr. Norton's Direct Line: (512) 322-5884  
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9820271



March 21, 2019

**VIA CERTIFIED MAIL RRR # 7016 0340 0000 8020 0913**

Mr. David Eppler, Enforcement Officer  
Superfund Enforcement Assessment Section (6SF-TE)  
U.S. EPA, Region 6  
1445 Ross Avenue  
Dallas, TX 75202-2733

**Re: Request for Information for the F.J. Doyle Salvage Superfund Site  
(SSID 061D), Leonard, Fannin County, Texas 75452.**

Dear Mr. Eppler:

In response to your February 15, 2019 letters addressed to Garland Power and Light ("GP&L") and Jeff English (collectively, "Respondents"), please find enclosed a combined response to the F.J. Doyle Salvage Superfund Site Information Request (the "Information Request").

After conducting a thorough and diligent search of records from various departments within the City of Garland ("the City") including GP&L, the City Health Department, the City Purchasing Department, the Office of the City Secretary, the City Financing Department, and the City Council; and after discussing the Information Request with current and former City employees; it is GP&L's and the City's belief that no records currently exist which indicate that the Respondents ever sold, supplied, sent, or disposed of materials or equipment with a PCB level of 50 ppm or greater to the F.J. Doyle Salvage Superfund Site ("the Site"), in accordance with 40 C.F.R. § 761.20.

In fact, by 1993, the City accomplished its goal of becoming PCB-free by removing and replacing each transformer in its electric utility with detectable PCB levels. However, prior to that time, the City had a policy in place whereby salvaged transformers with a <50 ppm PCB level were permitted to be sold, supplied, sent, or disposed of at salvage facilities, such as the Site at issue, in accordance with 40 C.F.R. § 761.20(c)(4).

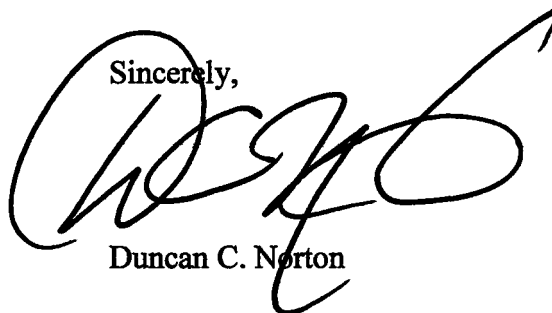
The only locatable document responsive to the Information Request, attached hereto as "Attachment 1," is a 1987 data log for Transformer PCB testing. This document shows that the City conducted the requisite PCB tests on its transformers to ensure they were below the 50 ppm threshold before selling, supplying, sending, or disposing of them at the Site or elsewhere. Although a thorough and diligent search has already been conducted, if any further responsive documents are located, Respondents will timely supplement.

Mr. David Eppler  
March 21, 2019  
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If you should have any questions regarding this response, please do not hesitate to contact my office.

Thank you,

Sincerely,

A handwritten signature in black ink, appearing to read "DCN", is written over the word "Sincerely,".

Duncan C. Norton

DCN/ldp

Enclosures

cc: Mike Betz, Deputy Attorney for the City of Garland  
Jeff English, Distributions Coordinator at GP&L

**RESPONDENTS' COMBINED RESPONSE TO THE  
F. J. DOYLE SALVAGE SUPERFUND SITE  
INFORMATION REQUEST**

This serves as the combined response of both Garland Power and Light ("GP&L") and Jeff English (collectively, "Respondents") to the U.S. Environmental Protection Agency, Region 6 letter, dated February 15, 2019, entitled, "F.J. Doyle Salvage Superfund Site Information Request" (the "Information Request").

Although Respondents have made a diligent and good-faith effort to respond to the requests set forth in the Information Request as fully and completely as practicable within the extremely short period of time provided, Respondents nonetheless respectfully set forth the objections stated in the attached Appendix A to preserve their rights. The responses below are based on the information available to Respondents as of the date of this response. As indicated below, some of the information requested in the Information Request is not currently available to Respondents, cannot be located, or does not exist. Accordingly, Respondents respectfully reserve the right to amend or supplement the responses below if and when additional information is received or located. Subject to, and without waiving such objections and reservations, Respondents answer as stated below. Each of the numbered items ("Requests") listed in the Information Request are set forth below, and Respondents' combined response to each such Request is provided below each such item in italics.

## **QUESTIONS**

1. Please provide the full legal name, mailing address, and phone number of the Respondent.

### **ANSWER:**

*Garland Power & Light  
City of Garland  
P.O. Box 461508  
Garland, Texas 75046-1508  
972-205-3487*

### **AND**

*Jeff English  
Distributions Coordinator  
Garland Power & Light  
5306 Kara Lane  
Allen, Texas 75002  
972-205-3487*

2. For each person answering these questions on behalf of the Respondent, provide full name, title, business address, business telephone and facsimile number.

### **ANSWER:**

*a) John Teel  
Former Assistant Director of Health for the City of Garland  
9010 Chimneywood Drive  
Rowlett, TX 75089  
214-578-3391*

*b) Jason Chessher  
Current Director of Health for the City of Garland  
1720 Commerce St.  
Garland, TX 75040  
972-205-3534*

*c) Darrell Cline  
Chief Financial Officer at Garland Power & Light  
217 North 5th St.  
Garland, TX 75040  
972-205-2650*

- d) *Mike Betz*  
*Deputy Garland City Attorney*  
*200 N. 5th St.*  
*Garland, TX 75040*  
*972-205-2380*
- e) *Jeff English*  
*Distributions Coordinator at Garland Power & Light*  
*217 North 5th St.*  
*Garland, TX 75040*  
*972-205-2650*
- f) *Duncan C. Norton*  
*Lloyd Gosselink Rochelle & Townsend, P.C.*  
*816 Congress Ave., Suite 1900*  
*Austin, TX 78701*  
*512-322-5800*  
*512-472-0532*
- g) *Samuel L. Ballard*  
*Lloyd Gosselink Rochelle & Townsend, P.C.*  
*816 Congress Ave., Suite 1900*  
*Austin, TX 78701*  
*512-322-5800*  
*512-472-0532*
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, and facsimile number.

**ANSWER:**

*Duncan C. Norton*  
*Samuel L. Ballard*  
*Lloyd Gosselink Rochelle & Townsend, P.C.*  
*816 Congress Ave., Suite 1900*  
*Austin, TX 78701*  
*512-322-5800*  
*512-472-0532*

4. Has any material or equipment owned or used by Respondent ever been sold to, supplied to, or otherwise turned over to FJ Doyle for scrapping, salvage, repair, consignment, resale or any other purpose?

**ANSWER:**

*Yes.*

5. Has any material or equipment owned or used by Respondent ever been sent to the Site for scrapping, salvage, repair, consignment, resale, or any other purpose?

**ANSWER:**

*Yes.*

6. If your answer to either or both questions is yes, provide a complete list of all such material or equipment, as well as any and all shipments thereof; include the following information with your response:

- a. The reason and approximate date(s) the material or equipment was taken out of service, and the date(s) sold, scrapped, disposed of, or otherwise turned over to FJ Doyle, or the date sent to the Site, if applicable.

**ANSWER:**

*Please see "Attachment 1" produced in response, which indicates the following:*

*(1) the dates on which GP&L declared the transformers as salvage (see "DATE SALVAGED" column);*

*(2) the dates on which the transformers were tested for PCBs (see "DATE SAMPLED" column); and*

*(3) the dates on which the transformers were sold to FJ Doyle (see "METHOD OF DISPOSAL" column).*

- b. Describe the condition of the material or equipment when it was sold, scrapped, disposed of, or otherwise turned over to FJ Doyle, or sent to the Site, if applicable.

**ANSWER:**

*Respondents currently lack sufficient information to accurately respond to this Request, but will timely supplement if any responsive information becomes available. Presently, respondents can only respond that, on information and belief, the transformers that were sold to FJ Doyle were irreparable and thus, salvageable.*

- c. List any amount of money paid or received by Respondent in relation to the sale, transfer, or delivery of the material or equipment. Indicate whether the price was reduced because of the inclusion of hazardous substances in the material or equipment.

**ANSWER:**

*Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available.*

- d. For each item of material or equipment, indicate whether it contained any oil when turned over to FJ Doyle. Supply any and all records that may indicate the contents

of the oil, in particular whether the oil may have contained any PCBs. Indicate what steps were taken to determine whether the oil contained any PCBs at the time of taking out of service or of disposal, and explain what precautions were taken to ensure that any PCBs in the equipment were disposed of properly.

**ANSWER:**

*Please see "Attachment 1" produced in response. On information and belief, the transformers sold to FJ Doyle from July to December of 1987 contained some amount oil. According to "Attachment 1," none of these transformers contained PCBs at a level of 50 ppm or greater.*

*The City of Garland Health Department conducted multiple tests to ensure that the transformers did not contain PCBs at a level of 50 ppm or greater before selling said transformers to FJ Doyle. Specifically, the Health Department would conduct a Chlor-N Oil test on the oil contained in the transformer. The Health Department would then run an EPA-approved laboratory test on the sample to verify that the oil did not contain PCBs at a level of 50 ppm or greater. Once verified, the transformers were authorized to be sold to FJ Doyle. With regard to the transformers which contained PCB levels at 50 ppm or greater, to the best of Respondents' knowledge, such equipment was properly disposed of at an EPA-approved site. This is evidenced by the manifest designations under the Method of Disposal column on "Attachment 1."*

- e. Supply all documents pertaining to the transaction, and to the movement or shipment of the material or equipment from your property, or from property where you operate.

**ANSWER:**

*Please see "Attachment 1" produced in response, which indicates the date on which the transformers were sold to FJ Doyle.*

- f. For each instance of equipment or material turned over to FJ Doyle or sent to the Site, indicate whether the equipment or material was transported by FJ Doyle, or by a separate company. In the case of the latter, identify both the individual and the company supplying the transportation services.

**ANSWER:**

*On information and belief, Respondents never physically transported the transformers identified in "Attachment 1." Rather, F.J. Doyle arranged for the equipment to be picked up by flat-bed trucks from the City of Garland Salvage Yard.*

- g. Identify all persons who controlled and/or transported the material or equipment prior to delivery to the Site. Include job title, duties, dates performing those duties,

supervisors for those duties, current position, and if applicable, the date of the individual's resignation or termination.

**ANSWER:**

*Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available.*

- h. Provide the correct name and addresses of Respondent's plants and other facilities from which Respondent sold or supplied equipment or material to FJ Doyle or otherwise sent equipment or material to the Site.

**ANSWER:**

*None to Respondents' knowledge. To the best of Respondents' knowledge, the only department in the City of Garland involved in selling the transformers was Garland Power & Light.*

- i. Provide a brief description of the nature of Respondent's operations at each plant or facility referenced above, including: the date such operations commenced and concluded; and types of work performed at each plant or facility, including but not limited to the industrial, chemical, or institutional processes and treatments undertaken at each plant or facility.

**ANSWER:**

*Not applicable.*

7. List, describe, and provide all documents relating to the information requested above. If any such documents have been destroyed, provide the dates of destruction.

**ANSWER:**

*Please see "Attachment 1" produced in response, which is a 1987 data log for GP&L's Transformer PCB testing.*

8. Did Respondent ever sell or supply transformers or any other oil-containing equipment to FJ Doyle or otherwise send transformers or any other oil-containing electrical equipment to the Site? If so, provide the following details for each item that was sold or supplied to FJ Doyle or may have been sent to the Site:
  - a. the name of the manufacturer and serial number;

**ANSWER:**

*Please see "Attachment 1" produced in response. The column labeled, "MFG." lists the manufacturer name or abbreviation and the column labeled "SERIAL NO." lists the serial number of the salvaged transformers.*

- b. the quantity of oil contained in the equipment;

**ANSWER:**

*Please see "Attachment 1" produced in response. The column labeled, "NAME-PLATE GALLONS" lists the estimated volume of each transformer, but does not necessarily indicate the quantity of oil contained therein when it was sold to FJ Doyle.*

- c. the concentration of PCBs contained in the oil;

**ANSWER:**

*Please see "Attachment 1" produced in response. To the best of Respondents' knowledge, the following information is accurate although it concerns a document over thirty years old. As such, Respondents make no assurances that the following information is entirely accurate. Respondents lack any additional documentation or guidance that would shed light on the PCB testing methodology.*

*There are two relevant columns concerning PCB concentration. The column labeled "CLOR-N OIL RESULTS" identifies the PCB concentration identified during the initial Clor-N Oil test. The column labeled "LAB ANALYSIS" identifies the PCB concentration identified during the second EPA-approved laboratory test. Under this column, "c-1" means "composite sample 1." Composite samples were gathered from a number of various transformers, which the Clor-N Oil test initially identified as containing PCBs under 50 ppm. These composite samples were then re-tested in an EPA-approved laboratory setting for verification. However, if the Clor-N Oil test identified a sample with a PCB level at 50 ppm or above, the sample would be re-tested in the laboratory individually without a composite.*

- d. the purpose of the shipment (e.g, salvage, repair or resale);

**ANSWER:**

*Please see "Attachment 1" produced in response. As indicated by the columns labeled "METHOD OF DISPOSAL" and "DATE SALVAGED," the transformers were first declared salvaged by GP&L and then sold to FJ Doyle.*

- e. the date on which the equipment left your facility;

**ANSWER:**

*Please see "Attachment 1" produced in response; specifically, the column labeled "METHOD OF DISPOSAL."*

- f. the company name, address, and telephone number of the transporter; and

**ANSWER:**

*Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available.*

- g. the names, addresses, telephone numbers, and dates of ownership of any and all prior owners.

**ANSWER:**

*Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available.*

- 9. Provide legible copies of any and all contracts, invoices, receipts, or other documents describing the transactions that Respondent implemented with FJ Doyle for each item identified in the question above.

**ANSWER:**

*Please see "Attachment 1" produced in response.*

- 10. Provide legible copies of any and all contracts, invoices, receipts, or other documents related to the transaction that Respondent implemented with transporters to transport the items in the question above.

**ANSWER:**

*After a duly diligent investigation, Respondents believe that they do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.*

- 11. Describe how both PCB-contaminated oil and uncontaminated oil were emptied from electrical transformers and capacitors or other electrical equipment and stored at Respondent's facilities.

**ANSWER:**

*To the best of Respondents' knowledge, oil was not emptied from the transformers at Respondents' facilities.*

- 12. Identify and describe, and provide all documents that refer or relate to, the following:
  - a. How were hazardous substances or materials containing hazardous substances used or planned to be used at the Site?

**ANSWER:**

*Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available. On*

*information and belief, Respondents were not involved in how any hazardous substances or materials were handled, used, or otherwise disposed of at the Site and thus, lack any knowledge responsive to this Request.*

*In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.*

- b. What was done to any hazardous substances once they were sent to the Site, including any service, repair, recycling, treatment, or disposal?

**ANSWER:**

*Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available. On information and belief, Respondents were not involved in how any hazardous substances or materials were handled, managed, or otherwise used at the Site and thus, lack any knowledge responsive to this Request. Respondents are only aware, according to "Attachment 1," that the transformers sold to FJ Doyle did not contain PCBs at a level of 50 ppm or greater.*

*In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.*

- c. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?

**ANSWER:**

*Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available. On information and belief, Respondents were not involved in any activities or business practices directly at the Site, and thus, lack any knowledge responsive to this Request.*

*In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.*

- d. How were hazardous substances typically used, handled, or disposed of at the Site?

**ANSWER:**

*Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available. On information and belief, Respondents were not involved in how any hazardous*

*substances or materials were handled, used, or otherwise disposed of at the Site and thus, lack any knowledge responsive to this Request.*

*In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.*

- e. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? When travelling to the Site, explain the details of the visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.

**ANSWER:**

*On information and belief, neither Respondents, nor their agents, representatives, or employees, ever traveled to the Site. As such, no documents responsive to this particular Request exist.*

- f. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?

**ANSWER:**

*On information and belief, Respondents only had knowledge about the substances contained in the transformers which the City of Garland sold to FJ Doyle; specifically, the transformers which contained a PCB level of less than 50 ppm. Respondents do not have particular knowledge about any hazardous substances that other individuals or entities may have disposed of at the Site.*

*Please see Attachment 1 produced in response, which demonstrates Respondents' knowledge of the particular substances sold to FJ Doyle.*

- g. Did Respondent have any influence over waste disposal activities at the Site? If so, how?

**ANSWER:**

*To the best of Respondents' knowledge, no. As such, no documents responsive to this particular Request exist.*

- h. Did Respondent know if the owner(s) and/or operator(s) of the Site were removing a hazardous substance from the transferred material?

**ANSWER:**

*Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available. On information and belief, Respondents were not involved in how any hazardous*

*substances or materials were handled, used, or otherwise disposed of at the Site and thus, lack any knowledge responsive to this Request.*

*In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.*

- i. Did Respondent know, based on general industry knowledge, if the hazardous substances would need to be removed from the transferred material in order for that material to be useful?

**ANSWER:**

*Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available.*

*In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.*

- j. What percentage of Respondent's total hazardous substances went to the Site?

**ANSWER:**

*Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available.*

*In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.*

- k. What steps did Respondent take to dispose of or treat any hazardous substances among the materials transferred to the Site? Provide any agreements and documents, including waste logs, journals, or notes, reflecting these steps.

**ANSWER:**

*Please see "Attachment-1" produced in response, which demonstrates that the City of Garland conducted multiple PCBs tests on the transformers before selling them to FJ Doyle. Please see responses to Requests Nos. 6(d) and 8(c) for further information about these tests.*

- l. What involvement (if any) did Respondent have in selecting the particular means and method of disposal of the hazardous substances at the Site?

**ANSWER:**

*To the best of Respondents' knowledge, Respondents did not have any involvement in selecting the particular means and method of disposal of the transformers it sold to FJ Doyle. As such, no documents responsive to this particular Request exist.*

- m. At the time Respondent transferred the materials containing hazardous substances to the Site, what did Respondent intend to happen to the hazardous substances? Provide any agreements and documents, including waste logs, journals, or notes, reflecting the intention of the parties. If Respondent does not have such documents and/or materials, please so state.

**ANSWER:**

*Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available.*

*In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.*

- n. With respect to all arrangements involving materials containing hazardous substances, at the time of the arrangement, specify the measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owners/operators at the Site regarding the proper handling and ultimate disposition of the materials Respondent sent there?

**ANSWER:**

*Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available.*

*In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.*

- o. What efforts, if any, did Respondent take to investigate the nature of the operations conducted at the Site and the environmental compliance of the Site prior to selling, transferring, delivering (e.g., for repair, consignment, or joint-venture), disposing of, or arranging for the treatment or disposal of any hazardous substances.

**ANSWER:**

*Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available.*

*In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.*

- p. How long did Respondent have a relationship with the owner(s) and/or operator(s) of the Site?

**ANSWER:**

*Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available. Respondents are only aware that the City of Garland sold transformers to FJ Doyle from approximately July to December of 1987.*

*Please see "Attachment 1" produced in response.*

- q. Provide names, addresses, telephone numbers, and email addresses of any individuals, including former and current employees, who may be knowledgeable of Respondent's operations and practices concerning the handling, storage and disposal of hazardous substances at the Site.

**ANSWER:**

*John Teel  
Former Assistant Director of Health for the City of Garland  
214-578-3391  
[dandjteel@msn.com](mailto:dandjteel@msn.com)*

13. If any documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

**ANSWER:**

*To the best of Respondents' knowledge, no further responsive documents are available as the documents sought, to the extent any ever existed, date back some thirty years and may have not been retained.*

14. If you believe there may be any person(s) able to provide a more detailed or complete response to any of the preceding questions and/or sub-questions or any person(s) who may be able to provide additional responsive documents, please identify such person(s) and the additional information you believe they may have.

**ANSWER:**

*None.*

## **APPENDIX A**

### **Objections**

**General Objection No. 1:** Respondents object to the EPA Information Request to the extent that it exceeds the authority granted to the U.S. Environmental Protection Agency under Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. §9604(e).

As provided in Section 104(e)(1) of CERCLA, 42 U.S.C. §9604(e)(1), the "authority of this subsection [Section 104(e)] may be exercised *only* for the purposes of determining the need for response, or choosing or taking any response action *under this subchapter*, or otherwise *enforcing the provisions of this subchapter*." Since Section 104(e) may only be invoked for these purposes, a necessary predicate for the invocation of Section 104(e) information request authority is that there be a release or threatened release of hazardous substances, or pollutants or contaminants that present an imminent and substantial danger to public health or welfare, subject to CERCLA enforcement authority. EPA's broadside information request, which purports to seek information concerning "any material or equipment owned or used by Respondent...sold to, supplied to, or otherwise turned over to FJ Doyle" (irrespective of whether there has been any release or threatened release of hazardous substances, or of pollutants or contaminants that present an imminent and substantial danger, at such facilities), exceeds the agency's CERCLA Section 104(e) authority. Moreover, the "subchapter" referred to in §104(e)(1) is Subchapter 1 of 42 U.S.C. Chapter 103, comprising 42 U.S.C. §§9601-9628, relating to the response to releases and threatened releases. Section 104(e) does not authorize use of the information request procedures contained in Section 104(e)(2) for other purposes, such as investigating potential compliance with other federal, state or local environmental laws or regulations.

General Objection No. 2: Respondents object to the EPA Information Request to the extent that it seeks information not relevant to the purposes stated in the U.S. EPA's letters dated February 15, 2019, CERCLA Section 104(e).

General Objection No. 3: Respondents object to the EPA Information Request as unreasonable and unduly burdensome to the extent that it seeks information and documentation dating back over thirty years, which may no longer exist. General Objection No. 4: Respondents object to the EPA Information Request as overly broad and not reasonably limited in time or scope.

General Objection No. 4: Respondents specifically object to the EPA Information Request improperly addressed to Jeff English as the purported Chief Executive Officer (CEO) of Garland Power & Light. Jeff English is a Distributions Coordinator for GP&L whereas Jeff Janky is the CEO.

Objection to Request Nos. 4 and 5: In addition to the General Objections set forth above, Respondents object to Request Nos. 4 and 5 to the extent that such Requests incorporate an overly-broad definition of "Material," without limitation, to encompass "any and all objects, goods, products, by-products, substances, or matter of any kind, including but not limited to wastes." Such a vague and overly-broad definition seeks to capture material that has nothing to do with the purported purpose of the Information Request (i.e. information pertaining to PCB-contaminated materials disposed of at FJ Doyle).

Objection to Request No. 6.b.: In addition to the General Objections set forth above, Respondents object to Request No. 6.b. because such Request contains an undefined and ambiguous term, "condition of the material or equipment."

Objection to Request Nos. 6.h. and 6.i.: In addition to the General Objections set forth above, Respondents object to Request Nos. 6.h. and 6.i. because such Requests contain an undefined and ambiguous term, "Respondent's plant(s)."

# **ATTACHMENT 1**

TRANSFORMER PCB SAMPLE RESULTS

SAL NO.	KVA	MFG.	CITY NO.	SERIAL NO.	ITEM NO.	NAME - PLATE - GALLONS	DATE SAMPLED	PERSON SAMPLING	CLOR-N OIL RESULTS	LAB ANALYSIS	METHOD OF DISPOSAL	DATE SALVAGED
50	75	ESCO	2320	2021471	175-102	EST 30	7-16-87	HUCKABY BROCK	< 50	C-1 8.0	SOLD 8/13/87 FJ DOYLE	5/7/87
51	75	RTR	8369	711052373	175-003	34	7-16-87	LAVENDER	< 50	C-3 1.7	SOLD 8/13/87 FJ DOYLE	5/11/87
52	25	RTE	4908	5311918	175-065	13	7-16-87	HUCKABY	< 50	C-1 8.0	SOLD 8/13/87 FJ DOYLE	5/11/87
53	25	ESCO	3389	11233813	175-070	EST 30	7-16-87	HUCKABY	< 50	C-1 8.0	SOLD 8/13/87 FJ DOYLE	5/11/87
54	25	RTE	4450	4307279	175-170	13	7-16-87	HUCKABY	< 50	C-3 1.7	SOLD 8/13/87 FJ DOYLE	2/12/87
55	10	ESCO	1961	2021421	175-048	EST 30	7-16-87	BROCK	> 50	1.6	SOLD 8/13/87 FJ DOYLE	5/14/87
56	75	R+4E	12345	73110368	175-003	50	7-16-87	HUCKABY	< 50	C-3 1.7	SOLD 8/13/87 FJ DOYLE	5/15/87
57	50	R+4E	3899	3306135	175-095	18	7-16-87	HUCKABY	< 50	C-1 8.0	SOLD 8/13/87 FJ DOYLE	5/18/87
58	31.5	Eoco	2288	2021455	175-084	EST 34	7-16-87	TEEL	> 50	1.6	SOLD 8/13/87 FJ DOYLE	5/18/87
59	15	Eoco	2119	6022912	175-170	EST 20	7-16-87	TEEL	> 50	3.4	SOLD 8/13/87 FJ DOYLE	5/18/87
60	15	Eoco	2821	9129335	175-056	EST 20	7-16-87	TEEL	> 50	3.3	SOLD 8/13/87 FJ DOYLE	5/18/87
61	37.5	Eoco	3382	11233830	175-084	EST 30	7-16-87	BROCK	< 50	C-1 8.0	SOLD 8/13/87 FJ DOYLE	5/18/87
62	25	Eoco	2636	6127876	175-180	EST 30	7-16-87	HUCKABY	< 50	C-2 2.1	SOLD 8/13/87 FJ DOYLE	5/18/87
63	50	Eoco	2516	5127274	175-095	EST 40	7-16-87	LAVENDER NO OIL	NO OIL	NO OIL	SOLD 8/13/87 FJ DOYLE	5/18/87
64	50	R+4E	7459	701014695	175-004	23	7-16-87	TEEL	< 50	C-2 2.1	SOLD 8/13/87 FJ DOYLE	5/18/87
65	167	V.T.	10981	73V1659	175-125	89	7-17-87	LAVENDER	< 50	1.6	SOLD 8/13/87 FJ DOYLE	5/19/87
66	37.5	Eoco	2178	6022946	175-195	EST 34	7-16-87	HUCKABY	< 50	C-1 8.0	SOLD 8/13/87 FJ DOYLE	5/21/87
67	10	W.H.	1212	51D14323	175-160	EST 10	7-16-87	BROCK	> 50	38	SOLD 8/13/87 FJ DOYLE	5/24/87

TRANSFORMER PCB SAMPLE RESULTS

SAL NO.	KVA	MFG.	CITY NO.	SERIAL NO.	ITEM NO.	NAME - PLATE - GALLONS	DATE SAMPLED	PERSON SAMPLING	CLOR-N OIL RESULTS	LAB ANALYSIS	METHOD OF DISPOSAL	DATE SALVAGED
68	25	Eoco	2631	6127871	175-180	EST 30	7-16-87	HUCKABY BROCK	< 50	C-1 8.0	SOLD 8/13/87 FJ DOYLE	5/26/87
69	167	V.T.	11043	73V4449	175-124	51	7-16-87	LAVERDEN	< 50	C-3 1.7	SOLD 8/13/87 FJ DOYLE	5/26/87
70	10	Eoco	3472	2334324	175-049	EST 8	7-16-87	TEEL	< 50	C-1 8.0	SOLD 8/13/87 FJ DOYLE	5/27/87
71	37.5	Eoco	802	678191	175-080	EST 30	7-16-87	HUCKABY	< 50	C-1 8.0	SOLD 8/13/87 FJ DOYLE	5/27/87
72	37.5	Eoco	3208	8232752	175-195	EST 30	7-16-87	TEEL	< 50	C-3 1.7	SOLD 8/13/87 FJ DOYLE	5/28/87
73	100	R+LE	6190	681071389	175-006	42	7-16-87	HUCKABY	< 50	C-3 1.7	SOLD 8/13/87 FJ DOYLE	5/29/87
74	50	Eoco	3677	4334831	175-095	EST 40	7-16-87	TEEL	< 50	C-1 8.0	SOLD 8/13/87 FJ DOYLE	6/1/87
75	50	R+LE	12770	742001925	175-004	30	7-16-87	LAVERDEN	< 50	C-2 2.1	SOLD 8/13/87 FJ DOYLE	6/4/87
76	50	R+LE	4412	3310341	175-195	18	7-16-87	BROCK	< 50	C-2 2.1	SOLD 8/13/87 FJ DOYLE	6/8/87
77	25	R+LE	4192	4302152	175-181	13	7-16-87	HUCKABY	< 50	C-2 2.1	SOLD 8/13/87 FJ DOYLE	6/17/87
78	75	R+LE	7928	711026147	175-003	34	7-16-87	LAVERDEN	< 50	C-2 2.1	SOLD 8/13/87 FJ DOYLE	6/19/87
79	37.5	Eoco	2343	6023014	175-195	EST 30	7-8-87	TEEL	< 50	?	SOLD 8/13/87 FJ DOYLE	6/19/87
80	37.5	Eoco	2696	5127634	175-195	EST 30	7-16-87	HUCKABY	750	14	SOLD 8/13/87 FJ DOYLE	6/19/87
81	50	R+LE	4105	3308449	175-095	18	7-16-87	LAVERDEN	750	1.6	SOLD 8/13/87 FJ DOYLE	6/19/87
82	50	R+LE	4107	3308451	175-095	18	7-16-87	HUCKABY	< 50	C-3 1.7	SOLD 8/13/87 FJ DOYLE	6/19/87
83	50	G.E.	663	B-370566	175-085	EST 40	7-16-87	LAVERDEN	> 50	92	MANIFEST #7835 12/27/87	6/23/87 PCB
84	50	Eoco	1939	2021462	175-095	24	7-16-87	TEEL	< 50	C-2 2.1	SOLD 8/13/87 FJ DOYLE	6/24/87
85	37.5	R+LE	4037	3307845	175-095	18	7-16-87	LAVERDEN	< 50	C-2 2.1	SOLD 8/13/87 FJ DOYLE	6/24/87

TRANSFORMER PCB SAMPLE RESULTS

SAL NO.	KVA	MFG.	CITY NO.	SERIAL NO.	ITEM NO.	NAME - PLATE-- GALLONS	DATE SAMPLED	PERSON SAMPLING	CLOR-N OIL RESULTS	LAB ANALYSIS	METHOD OF DISPOSAL	DATE SALVAGED
86	37.5	R+6E	3790	3305721	175-195	EST 30	7-16-87	BRACK	< 50	C-3 1.7	SOLD 8/13/87 F.J. DOYLE	7-1-89
87	75	R+6E	12630	741007332	175-003	34	7-16-87	TEEL	< 50	C-3 1.7	SOLD 8/13/87 FJ DOYLE	7-1-87
88	50	Eoco	3624	4334907	175-195	EST 40	7-16-87	HUCKABY	< 50	C-2 2.1	SOLD 8/13/87 FJ DOYLE	7-1-87
89	250	A L	6539	5014113	175-134	EST 80	7-16-87	TEEL	> 50	5.6		7-1-87
90	100	R+6E	6195	681071388	175-006	42	7-16-87	LAENDER	< 50	C-2 2.1	SOLD 8/13/87 FJ DOYLE	7/9/87
91	5	Eoco	1784	4916543	175-163	EST 3	7-16-87	HUCKABY	> 50	10.7	SOLD 8/13/87 FJ DOYLE	7/13/87
92	500	W. H.	6987	70PH10176	175-150	EST 80		TEEL	> 50		MANIFEST #7835 12/27/87	7/13/87 PCB
93	75	R+6E	12343	731100396	175-003						SOLOMON	7/20/87
94	75	RT+E	12940	741050960	175-003						SOLOMON	7/21/87
95	75	mcgrew	8248	5709330	175-001						SOLOMON	7/21/87
96	37.5	R+6E	3924	3110367	175-195						SOLOMON	7/22/87
97	31.5	RT+E	4500	4308945	175-195						SOLOMON	7/24/87
98	37.5	ESCO	2597	5127631	175-195						SOLOMON	7/27/87
99	37.5	ESCO	2679	5127636	175-195						SOLOMON	7/29/87
100	75	RT+E	8523	711059153	175-003						SOLOMON	7/30/87
101	500	W H	6985	70PH10175	175-150						MANIFEST #7835 12/27/87	7-31-87 PCB
102	25	RT+E	4443	4307272	175-180						SOLOMON	8-3-87
103	50	RT+E	3838	3305768	175-201						SOLOMON	8-4-87

## TRANSFORMER PCB SAMPLE RESULTS

[illegible]

## TRANSFORMER PCB & LE RESULTS

[illegible]

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## EXAMPLE RESULTS

SAL NO.	KVA	MFG.	CITY NO.	SERIAL NO.	ITEM NO.	NAME - PLATE - GALLONS	DATE SAMPLED	PERSON SAMPLING	CLOR-N OIL RESULTS	LAB ANALYSIS	METHOD OF DISPOSAL	DATE SALVAGED
36	75	CHANCE	C-8882	72A98998		-	5-8-87	BF	COMP #5A L 50		7-l. Doyle	
10	50	VANTRAN	C-10623	73V4805		51	5-8-87	BF	COMP #5A L 50	7.52		
40	500	G.E.	C-8733	J933206T72AA		180	5-8-87	BF	COMP #5A L 50			
41	500	WESTINGH	C-4951	65K 4796		-	5-8-87	BF	COMP #5A L 50			
21	300	G.E.	C-5128	F635398-66P		122	5-8-87	BF	COMP #5 750	(181-)	MANIFEST #7935 12/27/97	
COMPOSITE SAMPLE BF(4) TRANSFORMERS ABOVE (SAMPLE #5A) L50 PPM												

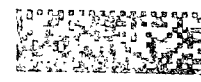
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